REMARKS

INTRODUCTION:

In accordance with the foregoing, claim 13 has been canceled without prejudice or disclaimer, and claims 10, 14, 16 and 17 have been amended. No new matter has been presented.

Claims 2-6 and 8-12, 14 and 15-17 are pending and reconsideration is respectfully requested. Claims 4, 10, 14 and 17 are independent claims.

ALLOWABLE SUBJECT MATTER

Claims 2-6 are allowed.

Claims 14-15 have previously been found to contain allowable subject matter.

Accordingly, independent claim 13 has been cancelled and claim 14 has been amended to include the features of cancelled independent claim 13. Accordingly, Applicants respectfully submit that independent claim 14 and its dependent claims 15 and 16 should also be allowed.

REJECTION UNDER 35 U.S.C. §101:

Claims 8-12 and 13-17 stand rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter. This rejection is traversed and reconsideration is requested.

Claims 10, 13 and 17 have been amended to address the rejection and to clarify the recitations. Accordingly, it is respectfully requested the rejection of claims 8-12 and 13-17 be withdrawn.

REJECTION UNDER 35 U.S.C. §102:

Claims 13 and 16 stand rejected under 35 U.S.C. §102(b) in view of U.S. Patent No. 5,111,511 issued to Ishii et al. ("Ishii").

Claim 14 has been amended to include all of the features of independent claim 13 plus additional features and Applicants submit that <u>Ishii</u> fails to disclose every feature of amended claim 14 as amended as asserted above.

Accordingly, withdrawal of the 102(b) rejection is respectfully requested.

Regarding the rejection of claim 16, this claim depends directly on independent claim 14, and is therefore believed to be allowable for at least the reasons noted above.

Claim 17 stands rejected under 35 U.S.C. §102(b) in view of U.S. Patent No. 5,568,196 issued to Hamada et al. ("<u>Hamada</u>"). The reasons for the rejection are set forth in the Office Action and therefore not repeated. This rejection is traversed and reconsideration is respectfully requested.

<u>Hamada</u> fails to disclose at least the following features as recited in independent claim 17:

"removing spurious still regions and spurious motion regions during an image field motion detection, based upon a limited added to or a limited subtracted from, pixel motion information values of a current image field using only immediately preceding and succeeding image fields to the current image field."

<u>Hamada</u> is directed to a motion adaptive noise reduction filter and motion compensated interframe coding system. The section of Hamada cited in the Office Action for teaching the removing operation recited above states in relevant part:

The immediately preceding (i-1)th frame from which noise has already been removed by the filter, is stored in the frame memory 5, and this immediately preceding (i-1)th frame is input to the motion compensator 3. *Hamada*, col. 3, lines 34-38.

Thus, <u>Hamada</u> suggests using only the preceding frame estimating motion. See also <u>Hamada</u>, col 3, lines 28-31 ("Motion is estimated in block units by comparing the immediately preceding frame stored in the frame memory 2 with the current frame, and a motion vector (MVx, MVy) is found for each block.").

In contrast, claim 17 recites at least "using only immediately preceding and succeeding image fields to the current image field." Accordingly, Applicants respectfully submit that since <u>Hamada</u> fails to teach or suggest all of the features of claim 17, this claim is allowable over <u>Hamada</u>, and withdrawal of the 102(b) rejection is respectfully requested.

CONCLUSION

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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